

REMARKS

Reconsideration of the present application, as amended herein, is respectfully requested.

Claims 1 – 20 are currently pending. Claims 1 – 20 currently stand rejected under 35 U.S.C. 103(a) over the Schröder reference, in view of Ping and Horning et al. Applicant respectfully traverses the rejection listed in the Office Action. In the Office Action it is stated that:

“Schröder differs from the claimed invention as Schroder does not disclose or suggest the claimed ‘tool including a pawl engaging member sized to pass through said opening in said front cover and bias said free end of said anti-reversal pawl out of engagement with said winding wheel.’

Horning et al. and Ping teach providing a tool for disengaging film restraining means in order to allow pre-winding of film within the camera body. It would have been obvious to one of ordinary skill at the time of the applicants's invention to provide a tool for disengaging the film restraining means of Schröder. One would have been motivated to so modify Schröder for the benefit of loading and prewinding film in day light conditions.”

Applicant agrees that Schröder does not teach or suggest a ‘tool including a pawl engaging member sized to pass through said opening in said front cover and bias said free end of said anti-reversal pawl out of engagement with said winding wheel’. However, Applicant disagrees and respectfully traverses the statement that either Horning or Ping supply the missing claim element cited in the Office Action, or other missing claim elements. In fact, Applicant believes that, not only does Shröder not teach or suggest the present invention, but when used in combination with Schröder, Horning and/or Ping teach away from Applicant's claimed invention.

Applicant's Claimed Invention

Among other things, Applicant's claimed invention requires:

A front cover including an opening therethrough;

An anti-reversal pawl including a fixed end and a free end, said fixed end being fixed proximal to said rear cover, . . . at least a portion of said opening aligned with said free end; and

a tool including a pawl engaging member sized to pass through said opening in said front cover and bias said free end of said anti-reversal pawl out of engagement with said winding wheel to permit movement of said winding wheel in both directions.

See also independent claims 13 and 18.

As can be seen, in Applicant's claimed invention, an opening in the front cover of the camera which is aligned with the free end of the anti-reversal pawl is located and sized to permit a tool to pass through the camera's body cavity, and bias the free end of the anti-reversal pawl out of engagement with the winding wheel. This is not taught or suggested by any of the references cited in the Office Action.

#### The Shröder Patent

In addition to failing to disclose a tool, as mentioned in the Office Action, Shröder additionally fails to teach or suggest other structures present in Applicant's claimed invention. In the Office Action, the front housing cover 3 of Shröder is alleged to be Applicant's claimed "front cover" and the second pawl 207 of the locking lever 201 is alleged to be Applicant's claimed "anti-reversal pawl". However, the Shröder patent fails to teach or suggest the claimed "opening" in the front cover aligned with the free end of the anti-reversal pawl. Without the claimed "opening", there can not be any teaching or suggestion in Shröder to combine the teachings of Shröder with the teachings of a system using a tool to disengage the anti-reversal pawl for film prewinding. Moreover, there can not be any teaching of the claimed invention, wherein the tool is passed through an "opening" in the front cover to bias the free end of the anti-reversal pawl (proximal to the back cover) out of engagement with the winding wheel, as presently claimed. As will be shown below, both Horning et al. and Ping also fail to teach or suggest the claimed "opening" in the front cover, and the tool adapted to be passed therethrough.

#### The Horning et al. Patent

The Horning et al. patent teaches a method of disengaging an anti-backup pawl from a film winding thumbwheel to permit an unexposed filmstrip to be prewound. In the Horning patent, a prior art method of disengaging the anti-backup pawl is shown, as well as the method that is the subject of the Horning et al. patent. The prior art method is described in the Horning et al. patent, as follows.

A prior art method of manually disengaging the anti-backup pawl from the thumbwheel involves inserting a disengaging tool behind the anti-backup pawl and prying the anti-backup pawl outwardly from the thumbwheel. This prior art method is illustrated in FIGS. 1-4 of the drawings. As shown in the FIG. 1, a cantilevered anti-backup pawl 10 is positioned in a slot 12 in the opaque rear cover part 14 of the one-time-use camera 16, and it has a fixed (non-movable) end 18 integrally connected with the rear cover part 14 and a free (movable) or pawl end 20 engaging the thumbwheel 22. The thumbwheel 22 is rotatably supported on the main body part 24 and protrudes outwardly (rearwardly) from the slot 12. To disengage the pawl end 20 from the thumbwheel 22, a disengaging tool 26 is first partially inserted into the slot 12 as shown in FIG. 2, and is then pivoted clockwise in FIG. 3 behind the pawl end to pry the pawl end away from the thumbwheel. **Col. 2, lines 23 – 39.**

The method that is the subject of the Horning patent is described as follows.

A method of disengaging the anti-backup pawl 42 from the film winding thumbwheel 22 to permit the unexposed filmstrip 34 to be prewound from the film cartridge 36 during original manufacture or recycling of the one-time-use camera 40 is shown in FIGS. 7 and 8. The method comprises the steps of:

manually pushing a disengaging tool 54 against the free end 48 of the anti-backup pawl 42 to pivot the anti-backup pawl at the fulcrum support connections 44 and 46 and depress the free end inwardly of the slot 12 and move the pawl end 52 outwardly of the slot, in order to disengage the pawl end from the thumbwheel; and

holding the disengaging tool against the free end to maintain the pawl end retracted from the thumbwheel, in order to permit the thumbwheel to be rotated in engagement with the film spool (not shown) in the film cartridge when the unexposed filmstrip is prewound from the film cartridge. **Col. 4, lines 19 – 36.**

Neither method of the Horning et al., patent teaches or suggests a hole in the front cover, aligned with a free end of the anti-reversal pawl, through which a tool passes to disengage the anti-reversal pawl. Specifically, both methods taught in Horning et al, teach coming at the anti-backup pawl from external to the back cover of the camera, to move the anti-backup pawl. There is no teaching or suggestion of passing a tool through any opening in the front cover to engage and/or bias the free end of the anti-backup pawl out of engagement with the winding wheel. Further, passing a tool through the front cover to the anti-backup pawl located proximal to the back cover would specifically destroy the teachings of the Horning et al. patent, which all refer to coming at the anti-backup pawl from the back cover. As such, Horning et al., neither alone nor in combination with Shröder or Ping, teaches or suggests Applicant's claimed invention, and the teachings of Horning would be destroyed to so extend them.

#### The Ping Patent

As with the Horning et al patent, above, the Ping patent fails to teach or suggest passing a tool through an opening in the front cover to the anti-backup pawl located proximal to the back cover. The claimed structures missing in Shroder and Horning, are missing from Ping, as well. As shown in Ping the only tool taught in that reference enters through the rear of the camera housing. See Figs. 9 and 10. More specifically, the Ping patent teaches an APS single use camera having a back cover with an aperture that provides access to the film sensor and the light lock door driver via a tool adapted to be received into the aperture. As described in the Ping patent:

Disposed in the back cover 14 is an aperture 22 in substantial alignment with a portion 64 of a light lock door driver 40 disposed in the camera and also in substantial alignment with a portion 68 of a film sensor 46 disposed on the main body 26 of camera 10. See FIGS. 2 and 23 for the aperture 22; see FIGS. 6 and 9-11 for the alignment of elements 64 and 68 with aperture 22. Aperture 22 is adapted to receive a pair of members 94, 96 disposed at a distal end of a preloading tool 90 as shown in FIGS. 3 and 9-11. **Col. 6, lines 10 – 18.**

Further, the Ping patent only teaches that the tool of 90 interacts with the light lock door driver and the film sensor, both of which are related to the state of the APS film cartridge light lock door. No mention was found in the Ping patent of an anti-reversal pawl, or of any part that

prevents the manually rotatable advance wheel 24 from rotating in the clockwise direction before or after film loading. The part that limits rotation of the wheel 24 does not appear to be shown in Ping. It states in the Ping patent:

With the light lock door open and the finger 50 out of the film path 36, the manual advance wheel 24 is rotated in a clockwise direction (as seen in FIG. 10) to thrust film out of the cassette and into the film path 36. The film advance wheel is continued to be rotated until the film 32 is received into slot 72 (which has been previously oriented so as to receive the leading edge 80 of film 32). **Col. 8, lines 40 – 46.**

However, the Ping patent does not teach or suggest that either the film sensor or the light lock door driver (which are the only items taught to be moved by the tool 90) limit the rotation of the wheel 24. Nowhere in the Ping patent does it teach or suggest that the use of the tool 90 is in any way responsible for permitting rotation of the wheel 24 during film loading. As such, Ping, neither alone nor in combination with Shröder or Horning et al., teaches or suggests Applicant's claimed invention.

In view of the foregoing, it is believed that all claims are presently in condition for immediate allowance, and such action is respectfully requested.

Respectfully submitted,



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Kerry Sisselman  
Reg. No. 37,237  
Concord Camera Corp.  
4000 Hollywood Blvd., Suite 650N  
Hollywood, FL 33021  
Telephone No.: (954) 331-4247  
Facsimile No.: (954) 989-4103